

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

HANS A. QUAACK, ATTILIO PO
and KARL LEIBINGER, on behalf of
themselves and those similarly situated,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING
CORP., SA),

Defendants.

No.: 03-CV-11566 (PBS)

STONINGTON PARTNERS, INC., a Delaware
Corporation, STONINGTON CAPITAL
APPRECIATION 1994 FUND L.P., a Delaware
Partnership and STONINGTON HOLDINGS,
L.L.C., a Delaware limited liability company,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING
CORP., SA),

Defendants.

No.: 04-CV-10411 (PBS)

GARY B. FILLER and LAWRENCE PERLMAN,
Trustees of the TRA Rights Trust,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING
CORP., SA),

Defendants.

No.: 04-CV-10477 (PBS)

JANET BAKER and JAMES BAKER, JKBaker
LLC and JMBaker LLC,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING
CORP., SA),

Defendants.

No.: 04-CV-10501 (PBS)

**PLAINTIFFS' UNOPPOSED MOTION
FOR LEAVE TO FILE MOTION PAPERS UNDER SEAL**

Class Plaintiffs together with plaintiffs Stonington Partners, Inc., Stonington Capital Appreciation 1994 Fund L.P. and Stonington Holdings, L.L.C., Gary B. Filler and Lawrence Perlman, Trustees of the TRA Rights Trust, and Janet Baker, James Baker, JKBaker LLC and JMBaker LLC (collectively the "Plaintiffs") hereby move, pursuant to Massachusetts Local Rule 7.2, for orders authorizing the filing under seal, in each of the above-captioned actions, of Exhibits G – O of the Declaration of Patrick T. Egan In Support Of Plaintiffs' Counsel's Motion For Protective Order ("Egan Declaration").

In support of this unopposed motion, Plaintiffs state as follows.

1. On May 31, 2005, the Court entered an Order Governing the Treatment of Confidential Information in each of the above-captioned actions (the "Confidentiality Order"). A true and correct copy of the Confidentiality Order is annexed as **Exhibit A** to this Motion. Under the terms of the Confidentiality Order, discovery materials that the producing party has designated as "Confidential Information" must be filed with the Court under seal. *See id.* at ¶10.

2. On May 19, 2006, Plaintiffs filed Plaintiffs' Counsel's Motion For Protective Order. In support of that motion, Plaintiffs also filed the Egan Declaration, which includes as Exhibits G-O, copies of Plaintiffs' objections and responses to Interrogatories propounded by Dexia. These exhibits have not been filed with the Court because they concern Plaintiffs' counsels' investigations of potential claims against Dexia and have been designated confidential by Plaintiffs under the May 31, 2005 Protective Order.

WHEREFORE, Plaintiffs respectfully request that this Court enter an order authorizing the filing under seal of Exhibits G-O of the Declaration of Patrick T. Egan.

**Certification Under Fed. R. Civ. P. 37(a)(2)(b),
and Local Rules 7.1(a)(2) and 37.1(b)**

Pursuant to Local Rules 7.1(a)(2), undersigned counsel hereby certify that counsel for Dexia does not oppose the instant motion.

Dated: May 19, 2006

Respectfully submitted,

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TABACCO BURT & PUCILLO

/s/ Patrick T. Egan

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